

# EXHIBIT C

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

*Plaintiff,*

v.

DONALD J. TRUMP,

*Defendant.*

No. 22 Civ. 10016 (LAK) (JLC)

**PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS**

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*Counsel for Plaintiff E. Jean Carroll*

In addition to the Court's usual *voir dire*, Plaintiff E. Jean Carroll provides the following questions for the Court's consideration. Plaintiff respectfully reserve the right to supplement these proposed questions as may be necessary during trial, as permitted by the Court.

***Personal Experience***

1. Have you or anyone close to you ever been wrongfully accused of serious wrongdoing?
2. Have you or anyone close to you ever been accused of sexual misconduct, including unwanted touching, sexual assault, or sexual harassment?
3. Have you or anyone close to you ever been subjected to sexual misconduct, including unwanted touching, sexual assault, or sexual harassment?
4. Have you or anyone close to you ever been a party to a lawsuit in which you or the person close to you either was accused or accused someone else of sexual misconduct?

***Familiarity with the Parties***

5. Do you or anyone close to you personally know E. Jean Carroll or anyone in her family?
6. Have you ever read any books or columns authored by E. Jean Carroll?
7. Have you ever actively followed E. Jean Carroll on any social media platform?
8. Do you or anyone close to you personally know Donald Trump or anyone in his family?
9. Have you ever read any books or columns authored by Donald Trump?
10. Have you ever actively followed Donald Trump on any social media platform?
11. Is there anyone who thinks that the fact that Mr. Trump served as the former President of the United States makes him more credible?
12. Have you or anyone close to you ever worked for any company or organization that is owned by or run by Mr. Trump or anyone in his family?
13. Is there anyone who uses or has used the social media platform Truth Social?

14. Have you or anyone close to you been active in a political campaign for Donald Trump and/or attended a rally for Donald Trump?
15. Have you or anyone close to you been active in a political campaign for a candidate that Donald Trump has supported?

***Potential Bias***

16. Is there anyone who has read or heard about this case before today? If yes, have you developed any strong feelings about the case?
17. Is there anyone who thinks that the fact that Ms. Carroll brought her lawsuit more than 20 years after the event occurred makes her less credible?
18. Is there anyone who believes that a victim of rape must present physical or medical evidence to prove that the rape in fact occurred?
19. Is there anyone who believes that a victim of sexual misconduct bears any amount of responsibility for what happened?
20. Is there anyone who would have trouble believing a victim of sexual misconduct if that victim chose not to seek immediate medical or other assistance?
21. Is there anyone who believes that the failure to receive immediate medical or other assistance following an event involving sexual misconduct makes it less likely that the event occurred?
22. Is there anyone who believes the results of the 2020 Presidential Election are illegitimate?
23. Is there anyone who believes that a private citizen should not be allowed to sue Donald Trump because he is a former President of the United States?

24. Is there anyone who has read or heard about the Manhattan District Attorney's indictment of Mr. Trump and formed strong views about that indictment?
25. Is there anyone who has read or heard about the Department of Justice's investigation of Mr. Trump's and his associates' mishandling of classified records and formed strong views about that investigation?

Dated: New York, New York  
March 30, 2023

Respectfully submitted,



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